

Michael Powell
Federal Communications Commission
445 12th St. N.W.
Washington, D.C. 20554

Attention: Michael Powell, Chairman

Reference: FCC Proceeding Docket #02-277

Subject: Repeal Of The 1975 FCC Regulation Prohibiting Media "Cross Ownership"

Mr. Powell, my local paper, the Journal Inquirer of Manchester, Ct., has reported that the FCC is considering repeal of its 1975 regulation prohibiting a company from owning a television station in the same area where it owns a newspaper, a practice known as, "Cross Ownership".

I understand the FCC's charter, established by the Communications Act of 1934, to be one which is supposed to conform with the spirit and the Constitutional requirement enunciated by the Supreme Court in 1945, that would have the commission's actions and rulings resulting in **"the widest possible dissemination of information from diverse and antagonistic sources – with the court further stating that this- is essential to the welfare of the people"**.

Joint ownership of newspaper and broadcast outlets in the same market area fails to meet that definition, and should not be allowed.

In comparing the relative merits of private citizens comments against those of corporations such as the media conglomerates currently petitioning against the exclusionary rule, how do citizens successfully petition the FCC with a voice equal to that of a corporation's? What published procedure utilizing what criteria, is used to establish the importance of a single citizen's vote, when considered against a single corporation's? Is it a specific number of votes or, in the end, is it your subjective judgment that decides?

You have publicly expressed your enormous satisfaction with the staggering number of people, (15,000) who, by submitting their comments, have expressed an interest in the FCC's review of broadcast media ownership regulations. What does the number of citizen votes have to be in order for the FCC to consider them significant enough to force a decision 1,500,000? 15,000,000?

Without a single focused and well financed voice to petition their case, in the end, you can ignore their input, decide in favor of the moneyed interest, and issue a glittering generality type of statement thanking all of those individuals who participated in the Democratic process.

You state that you are establishing a solid factual foundation for re-evaluating FCC media ownership policies, and that you intend to apply a sound empirical approach to that foundation, as a basis for deciding media ownership policies that promote competition, diversity and localism in today's media market. However, one definition of empirical would have you; "relying on experience or observation alone often without due regard for

system and theory”. That approach would allow you and the other commission members, in reaching your final decision, to apply your own subjective judgments to the end results of that process.

It seems the process that you would follow to reach a decision on this media cross ownership question, is flawed, as it depends in large part on your own subjective judgments. I reiterate my earlier expressed opinion that Joint ownership of newspaper and broadcast outlets in the same market area should not be allowed.

Sincerely,
William J. O'Keefe
Tolland, Ct. 06084

cc: Elizabeth S. Ellis
Publisher
Journal Inquirer